

ORIGINAL

ILLINOIS COMMERCE COMMISSION

Reliant Energy Solutions East, LLC :

Application for Certificate of :

Service Authority under Section :
16-115 of the Public Utilities Act. :

Docket No.

08-063

APPLICATION

Reliant Energy Solutions East, LLC ("Applicant"), hereby requests that the Illinois Commerce Commission ("Commission") grant it a certificate of service authority pursuant to Section 16-115 of the Public Utilities Act ("Act"). Applicant states that it meets the requirements of Section 16-115 of the Act [220 ILCS 5/16-115] and in support thereof, files this application, supporting documents, and attachments containing information showing that the Applicant meets the requirements of said Act. Applicant was previously granted authority from the Commission to be an ARES on November 8, 2005 under Docket No. 05-600. The purpose of this application is to modify its current license to provide customers a single billing option under Section 451.510 and to update its financial qualification pursuant to Section 451.220.

In support of its application, Applicant states as follows:

GENERAL [451.20 and 451.30]

1. Applicant's name and street address:

Reliant Energy Solutions East, LLC
1000 Main Street
Houston, TX 77002

2. Related Information:

- Type of business entity:
Limited Liability Company

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- Jurisdiction in which and under whose laws business entity was created:
Delaware
- Other names under which Applicant does business (D/B/A):
"Reliant Energy" and "Reliant Energy Solutions"
- Federal Employer Identification Number:
46-0471978
- Registered Agent in Illinois:
Corporation Service Company d/b/a Illinois Corporation Service Company
801 Adlai Stevenson Drive
Springfield, Illinois 62703
Phone: 217.492.2700
Fax: 217.492.2727

3. Contact Persons for the following

- a) issues related to processing this application,

Mark Baird
Director, Regulatory Affairs
Reliant Energy, Inc.
7642 W. 450 N
Sharpsville, IN 46068
281-451-7526
mbaird@reliant.com

Clare Doyle
Deputy General Counsel
Reliant Energy, Inc.
1000 Main Street
Houston, TX 77002
713-497-5228 (voice)
713-537-5228 (fax)
cdoyle@reliant.com

- b) issues related to retail customers, including complaint resolution, and

Rich Rathvon
379 Thornall St.
Edison, NJ 08837
732-321-2037 (voice)
732-321-2055 (fax)
rrathvon@reliant.com

- c) technical issues, including scheduling of generation, transmission, and distribution, and issues arising from relationships with other providers of electric services.

John Ritch
Power Dispatch & Scheduling
Reliant Energy, Inc.
1000 Main Street
Houston, TX 77002
713-497-1377 (voice)
713-497-1224 (fax)
jritch@reliant.com

Reliant Energy Solutions East, LLC has arranged to provide and agrees to continue to maintain a scheduling facility with 24-hour manned operation for coordination with control centers of scheduling changes, reserve implementation, curtailment orders and interruption plan implementation. Staffing at the facility is operated by Applicant, which may be contacted at all hours at the 24-hour number provided above.

4. Applicant's application for authority to transact business in the State of Illinois was approved on October 7, 2005. A copy of Applicant's application as approved by the Illinois Secretary of State is found in Attachment 4 [451.20(f)(1)].
5. Applicant's employees that will be installing, operating, and maintaining generation, transmission, or distribution facilities within the State of Illinois, as well as any entity with which the Applicant has contracted to perform those functions, have the requisite knowledge, skills, and competence to perform those functions in a safe and responsible manner in order to provide safe and reliable service in accordance with the criteria stated in Section 16-128(a) of the Act [220 ILCS 5/16-128(a)] [451.20(f)(2)].

Applicant has no intent to install, operate or maintain any generation, transmission or distribution facilities in the State of Illinois.

6. Description of Applicant's business. [451.30c)(1)]

Applicant will market electricity at retail as an Alternative Retail Electric Supplier (ARES) in Illinois. Applicant will supply electricity to retail customers consistent with its ARES certificate of service.

The Applicant is a subsidiary of Reliant Energy, Inc. (NYSE: RRI) based in Houston, Texas, providing electricity and energy services to retail and wholesale customers in the U.S. The company provides energy products and services to approximately 1.9 million electricity customers, ranging from residences and small businesses to large commercial, industrial, governmental and institutional customers, primarily in Texas. Reliant also serves commercial, industrial, and institutional clients in the PJM (Pennsylvania, New Jersey, Maryland) Interconnection.

The company is one of the largest independent power producers in the nation with more than 16,000 megawatts of power generation capacity in operation or under contract across the U.S. These strategically located generating assets utilize natural gas, wind, fuel oil and coal.

7. Geographic area in which Applicant seeks to be authorized to offer service (if less than entire State, provide detailed description) and the types of services it intends to offer. [451.30(c)]

Applicant seeks to offer service in the following service territories: Commonwealth Edison Company, and Illinois Power Company (d/b/a AmerenIP), Applicant intends to offer retail electricity and power in these service territories.

8. Identification of the Part 451 subpart (Subpart B, C, D, or E) under which the applicant is filing. Description of the characteristics of customer group(s) Applicant proposes to serve. [451.30(c)(2)]

Applicant is filing this application under Part 451(C) at this time, to serve nonresidential retail customers with annual electrical consumption greater than 15,000 kWh. Applicant intends to serve commercial, industrial, and institutional customer classes. As its view of economic opportunities evolves in the Illinois electricity market, Applicant may elect to seek to modify its license.

9. Proof of notification to each utility of Applicant's intent to serve in the utility's service area is provided in Attachment 9. [451.30 (c) (3)]

10. Applicant certifies that it:

- a) will comply with all applicable Federal State, regional and industry rules, practices, policies, procedures and tariffs for the use, operation, maintenance, safety, integrity, and reliability of the interconnected electric transmission system including the Open Access Same-time Information System (OASIS) mandated by 18 CFR 37 and the rules and operating guidelines and procedures of the regional or national electric reliability council(s) or organization(s) and their successors for any portion of the state in which the applicant is certified to provide retail electric service); [451.20(a)]
- b) will provide service only to retail customers that are eligible to take delivery services; [451.20(b)]
- c) will comply with informational and reporting requirements that the Commission may by rule establish; [451.20(c)]
- d) will comply with informational and reporting requirements that the Commission may establish regarding the provision of information required by Section 16-112 of the Act; [451.20(d)]
- e) complies with all other applicable laws and regulations and Commission rules and orders; [451:20(g)] and

- f) complies with all terms and conditions required by Sections 16-115A(a), (b), and (f), 16-119, 16-123, 16-125(b) and (c), 16-127, and 16-128(a) of the Act, to the extent those Sections have application to the services being offered by the alternative retail electric supplier. [451.30(d)(2)]
 - g) for Subpart C and D applicants, complies with all terms and conditions required by Section 16-115A(c) of the Act. [451.210 and 451.310(a)]
11. Applicant agrees to submit good faith schedules of transmission and energy in accordance with applicable tariffs. [451.20(a)]
 12. Applicant agrees to adopt and follow rules and procedures ensuring that authorizations received from customers, customer billing records, and requests for delivery service transmitted to utilities are retained for a period of not less than two calendar years after the calendar year in which they were created.[451.40(a)]
 13. Applicant agrees to adopt and follow rules and procedures to preserve the confidentiality of its customer's data.[451.40(b)]
 14. Whether Applicant currently has authority from the Commission to be an ARES, and if so, the Docket Number which such authority was granted.

Applicant was previously granted authority from the Commission to be an ARES on November 8, 2005 under Docket No. 05-600. Applicant requests that such current authority be consolidated with any authority granted pursuant to this application, under the docket number of this application.

RECIPROCITY REQUIREMENTS [451.20(E) AND 451.70]

15. The names and addresses of all Applicant's affiliated companies involved in electric retail sales or purchases in the North American continent are as follows: [451.20(e)(3)]

Reliant Energy Retail Services, LLC, 1000 Main Street, Houston, TX 77002.
Reliant Energy Solutions Northeast, LLC, 1000 Main Street, Houston, TX 77002.
16. Pursuant to **Public Act 095-0130**, the reciprocity requirement for ARES has been repealed.

LICENSE OR PERMIT BOND [451.50]

17. Applicant is required to execute and maintain a license or permit bond in the name of the People of the State of Illinois issued by a qualifying surety or insurance company authorized to transact business in the State of Illinois. The amount of bond shall equal the amount specified in Part 451.50(a) for the appropriate group of customers the Applicant seeks certification to serve. [Attach a copy of the license or permit bond

required by Part 451.50(a) and proof that the surety meets the definition of “qualifying surety” as set forth in Part 451.10.]

Applicant has executed and will maintain a License or Permit bond in the amount of \$150,000 in the name of the People of the State of Illinois. Applicant’s current License or Permit bond (# 104969660) was issued by Travelers Casualty and Surety Company of America, and effective August 16, 2007. A copy of this replacement License or Permit bond is provided in Attachment 17 to this Application. The cost of the bond was paid by the Applicant.

FINANCIAL QUALIFICATIONS [451.110, 451.220, or 451.320—Not applicable to Subpart E Applicants]

18. Applicant meets one of the six financial criteria set forth in Part 451.220(a)(1-6), as demonstrated in Attachment 18A-B.

Applicant is demonstrating its financial qualifications under the criteria set forth for a Payment Bond in Section 451.220(a)(4). Documents substantiating Applicants financial qualifications that are attached include a copy of the Payment Bond as issued by Travelers Casualty and Surety Company of America, a qualifying surety authorized to transact business in the State of Illinois. This payment bond (# 104994893)was originally provided to the Illinois Commerce Commission September 26, 2007 on behalf of both Commonwealth Edison Company, and Illinois Power Company (d/b/a AmerenIP), and is to be in full force and effect until September 18, 2008. A copy of the Payment Bond previously provided is in Attachment 18A. A good faith estimate of the peak amount of MW the Applicant will schedule during the calendar year is provided in Attachment 18B. An increase certificate dated January 23, 2008, to increase the original bond amount to that reflected in the good faith estimate is also provided in Attachment 18A.

19. Applicant will not provide electric power and energy with property, plant and equipment that it owns, controls, or operates.

TECHNICAL QUALIFICATIONS [451.120, 451.230, 451.330, or 451.420]

20. Applicant will not use electric generation, transmission or distribution facilities that it owns, controls or operates in serving customers. Applicant meets the requirements of Part 451.120, 451.230, 451.330, or 451.420, as demonstrated in Attachment 20A. Attachment 20B includes an exhibit containing a corporate organizational chart identifying the persons or agents who are being used to meet the requirements of this Part.

MANAGERIAL QUALIFICATIONS [451.130 and 451.140, 451.240 and 451.250, 451.340 and 451.350, or 451.430]

21. Applicant meets the managerial qualifications set forth in Part 451.130, 451.240, or 451.340 (not applicable to Subpart E Applicants), as demonstrated in Attachment 21A. Attachment 21B includes an exhibit containing a corporate organizational chart identifying the persons or agents who are being used to meet the requirements of Part 451.130(b), or 451.240(b), or 451.340(b).
22. Applicant is not relying on one or more agents or contractors to meet the technical and managerial requirements of Part 451.120 and 451.130, 451.230 and 451.240, 451.330, and 451.340, or 451.420.

FINANCIAL QUALIFICATIONS FOR SINGLE BILLING SERVICE [451.510]

23. Applicant intends to provide single billing services with approval of this application, and requests authorization from the Commission. It is Applicant's intent that Payment Bond(s) separate from that used to satisfy the financial obligations for ARES service under Section 451.220 will fulfill the financial qualification required for single billing service under Section 451.510. A good faith estimate of the respective amounts Applicant expects to meet financial qualification for each Commonwealth Edison Company, and Illinois Power Company (d/b/a AmerenIP) under single billing tariffs adopted pursuant to Section 16-118(b) of the Act during the next twelve months is provided in Attachment 18C. Copies of the Payment Bond(s) provided to Commonwealth Edison Company and to Illinois Power Company (d/b/a AmerenIP) for these estimate amounts are also provided in Attachment 18C. These documents demonstrate Applicant's ability to establish and maintain sufficient financial resources under Section 451.510(a).

WHEREFORE, Applicant requests that the Commission grant its application for service authority to serve customers with annual electrical consumption greater than 15,000 kWh (pursuant to Part 451, Subpart C) in the following service territories: Commonwealth Edison Company, and Illinois Power Company (d/b/a AmerenIP). Applicant intends to offer retail electricity and power in these service territories.

Respectfully submitted,

Reliant Energy Solutions East, LLC

By: MR Benner *MB*
Matthew R. Benner
Senior Vice President, Retail Marketing and
Operations

Clare Doyle
Deputy General Counsel
Reliant Energy, Incorporated
1000 Main Street
Houston, TX 77002
713-497-5228 (voice)
713-437-5228 (fax)
cdoyle@reliant.com

VERIFICATION

STATE OF Texas)
COUNTY OF Harris)

ss:

Matthew R. Benner, being first duly sworn, deposes and says that he is Senior Vice President, Retail Marketing and Operations of Reliant Energy, Incorporated; that he has read the foregoing Application of Reliant Energy Solutions East, LLC, and all of the attachments accompanying and referred to within the Application; and that the statements contained in the Application and the attachments are true, correct and complete to the best of his knowledge, information and belief.

MR Benner
Matthew R. Benner
Senior Vice President, Retail Marketing and Operations
Reliant Energy, Inc.

Subscribed and sworn to before me
This 20th day of December, 2007

Sia Labelle Beaton
Notary Public

[Stamp of Notary]



List of Attachments

Attachment 4 - Approval of Application to Transact Business by the Illinois Secretary of State.

Attachment 9 – Letters of Notification to Each Utility

Attachment 10g – Proposed Format of Public Notice

Attachment 17 - Copy of License or Permit Bond

Attachment 18A-C – Payment Bond, Financial Qualifications for ARES and Single Billing Service

Attachment 20A - Technical Qualifications

Attachment 20B - Organizational Chart

Attachment 21A - Resumes of Management

Attachment 21B - Organizational Chart